

Michael Johnson

From: Michael Doland <m.doland@focusmg.com>
Sent: Thursday, August 24, 2023 8:11 AM
To: Hudson Jobe; Juanita Schwartzkopf
Cc: Michael Johnson; Annette Sanchez; Kent Ries; Jason Rae; Rick Cass; Nita Chancellor; Carrie Hurst
Subject: RE: [EXTERNAL] - Re: McClain Case Documents

CAUTION: EXTERNAL EMAIL

Hudson

I have invited Jason & Rick to the dropbox folders as requested

Michael Doland

Chief Operating Officer
813.281.0062 Office | 813.281.0063 Fax | 727.510.3979 Cell
m.doland@focusmg.com

Focus Management Group

30725 US HWY 19N PMB 330
Palm Harbor, FL 34684
www.focusmg.com

From: Hudson Jobe <hjobe@qslwm.com>
Sent: Thursday, August 24, 2023 10:05 AM
To: Michael Doland <m.doland@focusmg.com>; Juanita Schwartzkopf <j.schwartzkopf@focusmg.com>
Cc: Michael Johnson <MJohnson@rqn.com>; Annette Sanchez <ASanchez@rqn.com>; Kent Ries <kent@kentries.com>; Jason Rae <jrae@lainfaulkner.com>; Rick Cass <fcass@lainfaulkner.com>; Nita Chancellor <nchancellor@qslwm.com>; Carrie Hurst <churst@RQN.COM>
Subject: RE: [EXTERNAL] - Re: McClain Case Documents

Michael (Doland),

I am having an issue with hosting a couple of the folders for my group. Can you please send the 2 dropbox links (that you previously sent me) to the 2 individuals below? It was "McClain Electronic Records" and "McClain Boxed and Paper Records". Thanks for your help - hmj

Jason Rae jrae@lainfaulkner.com
Rick Cass fcass@lainfaulkner.com

Hudson Jobe

Board Certified Business Bankruptcy Attorney
Texas Board of Legal Specialization
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Direct: (214) 880-1858 | Fax: (214) 871-2111
Email: hjobe@qslwm.com

From: Michael Doland <m.doland@focusmg.com>

Sent: Wednesday, August 2, 2023 12:57 PM

To: Juanita Schwartzkopf <j.schwartzkopf@focusmg.com>; Hudson Jobe <hjobe@qslwm.com>

Cc: Michael Johnson <MJohnson@rqn.com>; Annette Sanchez <ASanchez@rqn.com>; Kent Ries <kent@kentries.com>; Jason Rae <jrae@lainfaulkner.com>; Rick Cass <fcass@lainfaulkner.com>; Nita Chancellor <nchancellor@qslwm.com>; Carrie Hurst <churst@RQN.COM>

Subject: RE: [EXTERNAL] - Re: McClain Case Documents

Hudon

Please confirm the receipt of the dropbox invite from this morning and if it worked properly so I can send the invoice to the Second Dropbox.

Thanks

Mike

Michael Doland

Chief Operating Officer

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From: Juanita Schwartzkopf <j.schwartzkopf@focusmg.com>

Sent: Wednesday, August 2, 2023 1:52 PM

To: Hudson Jobe <hjobe@qslwm.com>

Cc: Michael Johnson <MJohnson@rqn.com>; Annette Sanchez <ASanchez@rqn.com>; Kent Ries <kent@kentries.com>; Jason Rae <jrae@lainfaulkner.com>; Rick Cass <fcass@lainfaulkner.com>; Nita Chancellor <nchancellor@qslwm.com>; Carrie Hurst <churst@RQN.COM>; Michael Doland <m.doland@focusmg.com>

Subject: Re: [EXTERNAL] - Re: McClain Case Documents

Mike Doland from FMG has been in communication with the Trustee's team regarding Share File, Dropbox, and the possibility of needing to send a hard drive of the electronic records related to the paper documents and the electronic devices.

One the Trustee's team confirms they are able to access the files, then let's set up the call for us to walk through the file set ups.

Thanks.

Juanita Schwartzkopf

773.724.2082 Office | 773.724.2083 Fax | 520.203.2926 Cell

j.schwartzkopf@focusmg.com

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6585 N. Avondale Ave.
Chicago, IL 60631

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On Aug 1, 2023, at 6:42 PM, Hudson Jobe <hjobe@qslwm.com> wrote:

Michael and Juanita –

Below is a link that Focus can use to upload documents. We would appreciate a copy of all non-privileged documents related to the Debtors. Thank you

<https://qslwm.sharefile.com/r-re73dbc121fee4819848f4e44c79d4445>

Hudson Jobe
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Direct: (214) 880-1858 | Fax: (214) 871-2111
Email: hjobe@qslwm.com

From: Juanita Schwartzkopf <j.schwartzkopf@focusmg.com>
Sent: Tuesday, August 1, 2023 2:32 PM
To: Michael Johnson <MJohnson@rqn.com>
Cc: Hudson Jobe <hjobe@qslwm.com>; Annette Sanchez <ASanchez@rqn.com>; Kent Ries <kent@kentries.com>; Jason Rae <jrae@lainfaulkner.com>; Rick Cass <fcass@lainfaulkner.com>; Nita Chancellor <nchancellor@qslwm.com>; Carrie Hurst <churst@RQN.COM>
Subject: [EXTERNAL] - Re: McClain Case Documents

Michael,

Would you have time to discuss so I can better understand the request?

Juanita Schwartzkopf
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On Aug 1, 2023, at 3:20 PM, Michael Johnson <MJohnson@rqn.com> wrote:

Thanks Hudson.

On the 2004 records responses, yes, we will get those over to you asap.

On the Focus records, perhaps Juanita, who you copied on the email, can send those directly to you. If not, we can send what we have.

On the "underwriting" requests, I am not sure what you are asking for. Can you clarify? We can certainly produce all the loan documents and the payment histories, as well as the Borrowing Base Reports that McClain sent and the AFCID inspection reports that Rabo generated when it inspected its collateral. There are, of course, also internal Rabo documents (for example, credit decisions and credit writeups) but we need to be careful producing those because they contain confidential and proprietary information and also may include privileged communications (it is not uncommon, for example, for an in-house Rabo attorney to show up in those records).

Michael Johnson | Ray Quinney & Nebeker P.C. | 36 South State Street, Suite 1400 | Salt Lake City, Utah 84111

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From: Hudson Jobe <hjobe@qslwm.com>

Sent: Tuesday, August 1, 2023 1:03 PM

To: Michael Johnson <MJohnson@rqn.com>

Cc: j.schwartzkopf@focusmg.com; Kent Ries <kent@kentries.com>; Jason Rae <jrae@lainfaulkner.com>; Rick Cass <fcass@lainfaulkner.com>; Nita Chancellor <nchancellor@qslwm.com>

Subject: McClain Case Documents

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Michael – good talking with you earlier. Per our discussion I would appreciate if you would forward me a copy of all items received by Rabbo in connection with the 2004 discovery and the non-privileged information with/of Focus. I would also appreciate a

copy of the original underwriting file as well as any subsequent updates to underwriting.

I have created 3 upload links below. One to use for the 04 exam documents, one for the Focus documents, and another general "other" category for your use in this case to get me large files. Please let me know if you have any issues with using the links. Thanks –
hmj

2004 Exam

<https://qslwm.sharefile.com/r-r0104bb786b144971afe70a075c8dc53d>

Focus

<https://qslwm.sharefile.com/r-rb2f18355083b454782230b701b669a49>

Other

<https://qslwm.sharefile.com/r-rf42cf5aceac3495089547625a208aa40>

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